

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

NANCY GOODMAN, *et al.*,

Plaintiffs,

vs.

Civil Action 2:14-cv-414
Judge Frost
Magistrate Judge King

J.P.MORGAN INVESTMENT
MANAGEMENT, INC.,

Defendant.

CAMPBELL FAMILY TRUST, *et al.*,

Plaintiffs,

vs.

Civil Action 2:15-cv-2923
Judge Frost
Magistrate Judge King

J.P. MORGAN INVESTMENT
MANAGEMENT, INC., *et al.*,

Defendants.

CONTINUED PRELIMINARY PRETRIAL ORDER

A continued preliminary pretrial conference was held in these consolidated actions on March 2, 2015. All parties were represented.

The parties have made their Rule 26(a)(1) disclosures.

Motions or stipulations for leave to amend the pleadings may be filed, if at all, by March 28, 2016.

The parties may, without further leave of Court, agree to exceed the limits on discovery established by the Federal Rules of Civil Procedure or the local rules of this Court. Absent agreement, the parties will arrange a conference with the Court.

The protective order entered in *Goodman*, which includes a claw back provision, will control in both these consolidated actions.

The parties contemplate discovery of electronically stored information and have agreed on a schedule for formulating a protocol governing such discovery, *Rule 26(f) Report of the Parties*, pp. 8-9, which the Court expressly **ADOPTS**.

All non-expert discovery must be completed by February 3, 2017.

The reports of primary experts must be produced by April 14, 2017; the reports of rebuttal experts must be produced by June 15, 2017. If the expert is specially retained, the reports must conform to Fed. R. Civ. P. 26(a)(2)(B), unless otherwise agreed to by the parties. If the expert is not specially retained, the reports must conform to Fed. R. Civ. P. 26(a)(2)(C), unless otherwise agreed to by the parties.

All expert discovery must be completed no later than August 31, 2017.

The parties are advised that the discovery completion dates require that discovery requests be made sufficiently in advance to permit timely response by each date. Discovery-related motions must be filed prior to the applicable discovery completion date.

Motions for summary judgment may be filed no later than September 30, 2017.

These consolidated cases will be available for final pretrial conference in January 2018 or as soon thereafter as the Court's calendar permits.

The parties agree that private mediation is appropriate.

Accordingly, these consolidated cases will not be referred to a Settlement Week. **No later than May 2, 2016, the parties will report their positions on the appropriate timing and vehicle for mediation.**

Defendants intend to move to strike the jury demand and will do so no later than 30 days prior to the final pretrial conference.

The parties continue to discuss the applicable calculation of damages. Absent agreement otherwise, plaintiffs intend to file "anniversary complaints."

If any date set herein falls on a weekend or legal holiday, the date of the next business day will control.

s/Norah McCann King
Norah McCann King
United States Magistrate Judge

March 2, 2016